

PennEast Pipeline Company, LLC
835 Knitting Mills Way
Wyomissing, PA 19610



October 30, 2019

Kevin White, P.E.
Environmental Group Manager
Pennsylvania Department of Environmental Protection
Regional Permit Coordination Office
2 Public Square
Wilkes-Barre, PA 18701-1915

Re: PennEast Pipeline Company, LLC
Technical Deficiency Comment Response Submittal
PADEP Application Nos. E40-780, E13-185, E48-435, and E09-998
Luzerne, Carbon, Northampton, and Bucks Counties

Dear Mr. White:

On December 21, 2018, the PennEast Pipeline Company, LLC (PennEast) submitted four Chapter 105 Joint Permit Applications (JPAs) to the Pennsylvania Department of Environmental Protection (PADEP) for wetland, watercourse, and floodway impacts associated with construction and operation of the proposed PennEast Pipeline Project (Project) in Luzerne, Carbon, Northampton, and Bucks Counties. The PADEP determined the submissions to be administratively complete on January 25, 2019 and issued technical comments for the December 2018 JPAs in letters dated July 3, 2019. The response packages herein respond to PADEP's July 3, 2019 comments.

In response to PADEP's comments, PennEast revised workspace in a couple of locations to reduce environmental impacts. PennEast has also implemented some minor route and workspace changes that were requested by other state agencies and/or landowners. PennEast is confident that the changes will result in the most optimal design to fulfill the Project's purpose and need while continuing to minimize impacts. These workspace changes include:

- Luzerne County
 - o Milepost (MP) 6.3R2 – 6.5R4: An approximately 300-foot pipeline deviation, resulting in a workspace reduction of 0.67 acre, was implemented at the request of the landowner. This workspace reduction will not affect wetland, watercourse, or floodway impacts.
 - o MP 11.4R2 – 12.3R3: A 0.51-mile reroute was incorporated at the request of the Pennsylvania Department of Conservation and Natural Resources (PADCNR) Right-of-Way (ROW) Administration Office. Additionally, PennEast reduced the construction ROW through Pinchot State Forest. The route deviation will not affect wetland, watercourse, or floodway impacts, and the workspace reduction will minimize wetland impacts.

- Carbon County
 - Kidder Compressor Station: Workspace was increased by 4.92 acres for a temporary staging area near the entrance of the proposed Kidder Compressor Station. The staging area may be used for various purposes including but not limited to parking, equipment storage, and contractor trailers. This workspace addition will not affect wetland, watercourse, or floodway impacts.
 - MP 33.2R3: Workspace has been reduced by 0.03 acre at an unnamed tributary of Mud Run (042115_JC_1002_P_MI), reducing watercourse and floodway impacts.
 - MP 35.6: PennEast has reduced workspace by 0.07 acre. This workspace reduction will not affect wetland, watercourse, or floodway impacts.

- Northampton County
 - MP 52.7R3 – 52.8R3: Workspace was increased by 0.14 acre to allow for tree clearing outside of a 30-foot wide construction corridor in this area; however, construction impacts will still be limited to a 30-foot wide workspace. This proposed workspace change will affect wetlands, watercourses, and floodways, and it has been coordinated with the Pennsylvania Fish and Boat Commission (PFBC).
 - MP 52.9R3 – 53R3: Workspace was increased by 0.11 acre to allow for tree clearing outside of a 30-foot wide construction corridor in this area; however, construction impacts will still be limited to a 30-foot wide workspace. This proposed workspace change will affect wetlands, watercourses, and floodways, and it has been coordinated with the PFBC.
 - MP 56: Workspace was reduced by 0.11 acre to reduce wetland impacts, as requested by the PADEP.
 - MP 64.3R2 – 65.1: Workspace was adjusted at the request of the landowner, resulting in an increase of 0.62 acre of potential earth disturbance. The proposed workspace change reduces impacts to wetlands.
 - MP 69.4R3 – 69.8R3: Workspace was adjusted at the request of the landowner, resulting in an increase of 2.68 acres of earth disturbance. This workspace change will not affect wetland, watercourse, or floodway impacts.
 - MP 69.9R3 – 70R4: Workspace was adjusted at the request of the landowner, resulting in an increase of 0.11 acre of potential earth disturbance. This workspace change will not affect wetland, watercourse, or floodway impacts.
 - MP 70.2R3: Workspace was increased by 0.02 acre to accommodate a construction entrance to a staging area. This workspace change will not affect wetland, watercourse, or floodway impacts.

- Bucks County
 - MP 76: PennEast reduced workspace by 0.08 acre.

PennEast respectfully submits for your review the enclosed responses to the Technical Deficiency comments for the Luzerne, Carbon, Northampton, and Bucks County JPAs. The contents of the response packages are summarized below.

1. PennEast has responded to PADEP comments in the enclosed comment response matrices. Acronyms used in the tables are defined in an accompanying acronym list.

2. PennEast has included county-specific Tables of Contents that outline the documents and drawings that were submitted in the December 2018 JPA and specify which documents have been updated to address PADEP's comments, Project changes, and continued agency consultations.
 - The term "Replacement" within the October 2019 Submittal column indicates when an entire document or drawing package should replace the December 2018 version.
 - The term "Addendum" within the October 2019 Submittal column indicates that the document should be considered an addendum of the December 2018 JPA (i.e. continued agency consultations, Wetland Delineation Report, Wetland RAP and Functions and Values forms).
 - A dash ("-") indicates that the JPA Section did not require edits to address PADEP comments and was unaffected by Project changes.
3. In some instances, PennEast determined that it may be helpful to provide PADEP with supplemental information to address a comment. Attachments pertaining to these comments are included in the response package. The JPAs were not revised to include this information.

Thank you for your continued time and effort in reviewing these applications. We look forward to continuing to work with the PADEP in the coming months. Please feel free to contact me at (610) 373-7999 x 1172 or aholly@ugies.com if you need any additional information or have any questions during your review of these responses.

Sincerely,



Amber Holly
Environmental Manager
PennEast

cc: Michael Luciani, PADEP
Glenn Weitknecht, USACE
Mike Dombroskie, USACE
Jamie Davis, USEPA
Sarah Binckley, AECOM
Michael DeNichilo, Mott MacDonald